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April 9, 2020

By ECF

Hon. Ronnie Abrams
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *Falvey Cargo Underwriting Ltd*, et al.,
v. ZIM Integrated Shipping Services Ltd., et al.
1:19-cv-11495-RA
Our File: 6302

Dear Judge Abrams,

We represent Plaintiffs in the captioned matter and write pursuant to Your Honor's 26 February 2020 Order, Docket Entry 15, setting the initial pretrial conference in this matter for 17 April 2020. Plaintiffs respectfully request that the initial conference be adjourned until a date most convenient for the Court in the second half of May 2020. This request is necessitated by the fact that Plaintiffs have granted Defendant Mega Shipping and Forwarding Ltd. d/b/a Meridian Line and Meridian Line an extension, up to and including 6 May 2020, to file its answer in this matter. Further, Defendant ZIM Integrated Shipping Services Ltd. ("ZIM"), a foreign entity, has refused to accept service, such that Plaintiffs have been required to pursue international service of process.¹ Plaintiffs' efforts to effect international service have been impaired by the COVID-19 pandemic. As Plaintiffs continue to arrange for international service, they remain in talks with Defendants in an attempt to amicably resolve this matter. Plaintiffs will advise the Court if they are successful in that endeavor, but in the interim they respectfully request that the initial conference be adjourned until a date most convenient for the Court in the second half of May 2020. Plaintiffs appreciate Your Honor considering this request.

¹ Because ZIM is a foreign entity, the 90-day period established by Fed.R.Civ.P. 4 does not apply to service on it. Fed.R.Civ.P. 4(m).

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Respectfully,

KENNEDY LILLIS SCHMIDT & ENGLISH

By: s/ Nathan T. Williams

Nathan T. Williams

Application granted. The initial conference scheduled for April 17, 2020 is hereby adjourned to May 29, 2020 at 2:15 p.m. The parties shall file the joint letter and proposed case management plan no later than May 22, 2020.

SO ORDERED.

A handwritten signature in blue ink, appearing to be 'RA', with a horizontal line extending to the right.

Hon. Ronnie Abrams
4/10/2020